



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

April 9, 2007

Reply To
Attn Of: ETPA-088

Ref: 05-029-AFS

Mr. Joe Miczulski, Environmental Coordinator
Ketchum Ranger District
P.O. Box 2356
Ketchum, ID 83340

Dear Mr. Miczulski:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the proposed **Sun Valley Resort (Bald Mountain) 2005 Master Plan Phase I Projects**. Bald Mountain is located on public lands administered by the Sawtooth National Forest and Bureau of Land Management (BLM), located in Blaine County, Idaho. We are submitting comments pursuant to our responsibility under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The Forest Service and BLM (Agencies) are proposing to complete Phase I projects identified in the 2005 Bald Mountain Master Development Plan (MDP). These projects are focused on expanding the lift and terrain network, on-mountain guest services and snowmaking coverage. The DEIS considers a no-action alternative and two action alternatives:

1. Alternative 1 – No Action. Under this alternative, the lift and terrain network would remain unchanged. Bald Mountain currently has a comfortable carrying capacity (CCC) of 9,200, and a lift and trail network consisting of 14 lifts, 76 named trails, 1,024 skiable acres, and 398 acres of snowmaking coverage.
2. Alternative 2 – Proposed Action. Under this alternative, the Agencies would install a gondola between River Run and the Roundhouse Restaurant (6,400 feet in length), renovate the Roundhouse Restaurant, remove the Exhibition chairlift, and install a terrain park on lower Greyhawk. This alternative would also add two trails to the system (Guyer Ridge and Seattle Ridge). These trails would be fully developed through grading, vegetation removal, and snowmaking coverage. Collectively, the proposed projects would expand the amount of skiable terrain by 51 acres (to 1,072 acres) and increase snowmaking coverage by 143 acres (to 541 acres). This would expand the CCC of Bald Mountain to 9,460.
3. Alternative 3 – This alternative was created in response to issues raised by the public concerning snowmaking noise, visual concerns, impacts to existing skiing terrain, and private property owners. Alternative 3 contains all of the elements found in Alternative 2, with two exceptions: 1) Development of Guyer Ridge would be limited to a strategic

thinning of overstory vegetation (no grading or snowmaking would be pursued); and 2) the proposed terrain park would be constructed in the Janss Pass area instead of the lower Greyhawk area. Collectively, the proposed projects would expand the amount of skiable terrain by 44 acres (to 1,065 acres) and increase snowmaking coverage by 109 acres (to 507 acres). Like Alternative 2, this would expand the CCC of Bald Mountain to 9,460.

The EPA appreciates the effort of the Sawtooth National Forest and the Twin Falls District of the BLM in preparing this DEIS to analyze impacts associated with Phase I development projects on Bald Mountain. EPA does not object to the expansion of Bald Mountain, but the need for expansion is not well supported by the information presented in the DEIS. The EPA believes that the purpose and need for ski area expansion should be better supported and documented in the Final Environmental Impact Statement (FEIS).

The Sawtooth National Forest Land and Resource Management Plan (LRMP) indicates that decisions to develop recreation facilities should be based on evidence and evaluation of: 1) increased public need; 2) operating efficiency; 3) the need to reduce concentration on, or conflicts at, existing sites; or 4) the need to reduce resource degradation from recreation use and existing developments. We recommend that the FEIS more fully address how the proposed projects are consistent with these triggers for development.

In addition, we have concerns related to the assessment of cumulative impacts associated with future development and snowmaking operations. The document does a commendable job of identifying past, present and reasonably foreseeable future actions, but does not fully address how those actions have affected, are affecting or would affect resources of concern, such as the Big Wood River.

Our detailed comments, concerns, and questions regarding the Bald Mountain Ski Area DEIS are enclosed for your review and consideration as you complete the FEIS. Based on the information provided, we are rating the DEIS as EC-2 (Environmental Concerns – Insufficient information). An explanation of this rating is enclosed.

We appreciate the opportunity to review and comment on this draft EIS. If you have questions or would like to discuss these comments, please contact Teresa Kubo of my staff at (503) 326-2859.

Sincerely,

/s/

Christine B. Reichgott, Manager
NEPA Review Unit

Enclosure

**Sun Valley Resort (Bald Mountain) 2005 Master Plan
Phase I Projects Draft Environmental Impact Statement
EPA Region 10 Detailed Comments**

Purpose and Need

The DEIS identifies the following purpose and need for these projects: 1) improve circulation between the River Run base area and the Roundhouse facility for both skiers and non-skiers; 2) provide improved opportunities for on-mountain guest services; 3) provide a consistent, predictable, recreational experience across Bald Mountain and help disperse skiers; 4) provide additional trail capacity and alternative features to better distribute skiers across the trail network in response to evolving guest expectations; 5) evaluate ski resort trails and roads that extend outside of the special use permit (SUP) boundary area and adjust the boundary as deemed appropriate; and 6) maintain vegetation at Bald Mountain in a manner that continues to be compatible with historic and future recreation uses.

These purpose and need statements are not wholly consistent with the direction of the LRMP, which (as noted above) holds that decisions to develop recreation facilities should be based on evidence and evaluation of: 1) increased public need; 2) operating efficiency; 3) the need to reduce concentration on, or conflicts at, existing sites; or 4) the need to reduce resource degradation from recreation use and existing developments.

Given the relatively small change in CCC (an increase of 260), it appears that the proposed trail construction is not intended to reduce pressure on existing infrastructure, but rather to improve the quality of the amenities currently offered at Bald Mountain. Aside from subjective observations related to trail accessibility and density, there is little documentation of increased public need for these trails. In fact, the projected skier visitation through 2016 (page 3-14) would seem to indicate that visitation rates have largely stabilized and are unlikely to increase beyond CCC.

In particular, we question the need to develop Guyer Ridge. As noted on 3-135, trail construction (grading, re-contouring and vegetation removal), coupled with its ridge-top location, would increase the risk of erosion and substantial sediment yield following site disturbance. Any increase in sediment yield to Warm Springs Creek could be significant given the status of the Big Wood River (to which Warm Springs is a tributary) as listed under the CWA 303(d) for total suspended solids and substrate sediments.

We also note that Guyer Ridge would be classified as “advanced” terrain. Given that over 57% of the terrain under the no-action alternative is classified as “advanced” (p. 2-24), it would seem that that this is not an underrepresented terrain type on the mountain. Its location on the fringe of the trail network would likewise limit the amount of use. Additionally, under the proposed action, snowmaking coverage on Guyer Ridge (29 acres) would require the annual diversion of around 32 acre feet of water. The limited use and accessibility of this trail, combined with its potential environmental impacts call the need for this commitment of public resources into question. In the absence of a compelling argument for developing Guyer Ridge,

we strongly recommend that the Agencies consider an alternative that does not develop Guyer Ridge. Should further analysis conclude that development of the trail is warranted (due to documented trail overuse, for example), the Agencies should consider the thinning approach advanced in Alternative 3. As noted on page 3-22, there are limited opportunities on the mountain for tree/gladed skiing. Development of the trail under Alternative 3 would provide for this type of skiing experience. If skier safety/circulation is the primary concern, a fourth alternative that looks at developing Guyer Ridge from International to Upper Cozy could be considered (leaving the rest of the ridge undeveloped).

The document makes a good case that there are places on the mountain (Olympic Lane, Olympic Ridge and Lower Olympic) where skier safety necessitates trail modification. We question, however, the proposal to locate a terrain park on lower Greyhawk, where skier circulation concerns have been identified. This action would seem rather to increase the likelihood of user conflict than reduce it. This would be inconsistent with LRMP direction. Furthermore, the DEIS indicates that “evolving guest expectations” demand that a terrain park be developed, but there is no analysis included in the document that indicates that Bald Mountain visitors find the lack of terrain park features to be a detractor. We recommend that the FEIS more fully demonstrate “increased public need” for a terrain park.

Snowmaking

It is stated that under the proposed alternative, snowmaking would be added to 143 acres of runs, and that this would require diversion of an additional 159.3 acre-feet of water (over average) (3-118). Snowmaking can modify the timing and quantity of spring runoff, potentially influencing stream channel stability. We recommend that the document consider whether expanded snowmaking, combined with increased water yield from vegetation removal, would result in modified runoff patterns and increased runoff to area streams that may affect stream channel stability and/or exacerbate erosion. Should analysis indicate such risks exist, stream channel stabilization or additional erosion control measures may need to be identified.

We also note that water needs for snowmaking in some ski areas have created winter time dewatering concerns in streams. Overwintering pools in small streams are often critical fisheries habitat, and river and groundwater diversions during winter could impact overwintering pools. Given that the Warm Springs Creek and Big Wood River provide habitat for the Wood River Sculpin, we recommend that the DEIS assess potential affects of snowmaking diversions and other ski area diversions (e.g. restaurant water supply) upon overwintering pools and fisheries habitat from groundwater pumping and surface diversions.

With respect to the Best Management Practices (BMPs) listed in Chapter 2, we would encourage the Agencies to research and incorporate BMPs related to the installation and operation of snowmaking equipment. These should include provisions related to conserving water, accurate snow placement, and minimizing evaporative and runoff losses.

Finally, we note that the cumulative effects matrix in Appendix A identifies a number of additional snowmaking installations and other developments (hotels and condominiums) to be pursued by the Sun Valley Company (SVC). The cumulative effects discussion in Chapter 3 considers many of the potential impacts associated with this development, but does not consider

the proposed snowmaking coverage in the context of future water need. The proposed water withdrawal would account for over 83% of Sun Valley Company's current water right. Will the proposed withdrawal necessitate that future projects increase pumping rates? What effect would this have on flow rates and aquatic resources? Consideration should also be given to how proposed withdrawals may affect the ability of the communities of Sun Valley and Hailey to meet their future water needs.